

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

|                               |          |                          |
|-------------------------------|----------|--------------------------|
| <b>IN RE: Debora Williams</b> | <b>:</b> | <b>Case No. 24-11503</b> |
| <b>Debtor</b>                 | <b>:</b> | <b>Chapter No. 13</b>    |
|                               | <b>:</b> |                          |
| <b>M &amp; T Bank</b>         | <b>:</b> |                          |
| <b>Movant</b>                 | <b>:</b> |                          |

**DEBTOR'S AMENDED ANSWER TO CITIZENS BANK, N.A.'S**  
**MOTION FOR RELIEF**

Debtor, Debora Williams, and through her attorneys, Jeanne Marie Cella and Associates, LLC, answer M & T Bank's ("Movant's") Motion for Relief from the Automatic Stay and respectfully represent the following:

1. Admitted.
2. Admitted.
3. Denied. Strict proof required at trial.
4. Denied. Strict proof required at trial.
5. Admitted.
6. Denied. Strict proof required at trial.
7. Denied. Strict proof required at trial.
8. Admitted.
9. Debtor is without knowledge of this averment.
10. Admitted.
11. Denied statement is a conclusion of law.
12. Denied. Strict proof required at trial.
13. Denied as stated. Averment does not state a factual assertion to which a response is required.

14. Denied statement is a conclusion of law.
15. Denied. Strict proof required at trial.

**WHEREFORE**, the debtors respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay because she has sufficient funds to resolve the Motion for Relief and is in the process of resolving the matter per stipulation.

Respectfully Submitted,  
**Jeanne Marie Cella and Associates, LLC**

/s/ Jeanne Marie Cella, Esq

Jeanne Marie Cella, Esq.  
Attorney for Debtor  
221 N Olive St  
Media, PA 19063  
(610) 505-0541 Phone

Dated: November 11, 2024

